



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

75 Hawthorne Street
San Francisco, CA 94105

Purpose: RCRA Compliance Evaluation Inspection

Facility: Island Recycling, Inc.

Location Address: 91-140 Kaomi Loop
Kapolei, HI 96707 - 1712

RCRA ID Number: HIR 000 138 263

Date of Inspection: June 27, 2014
Time In / Time Out 1:14 pm / 3:30 pm


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Report Date: September 15, 2014

Report Prepared by:



Christopher Rollins

A. Introduction

On June 27, 2014 representatives of the U.S. Environmental Protection Agency (EPA) and the Hawaii Department of Health (HDOH) conducted an unannounced hazardous waste compliance evaluation inspection (CEI) of the Island Recycling, Inc. (IRI) facility located in Kapolei, Hawaii. The purpose of the inspection was to determine IRI's compliance with applicable federal environmental statutes and regulations, and in particular, the Resource Conservation and Recovery Act (RCRA), as amended, the regulations provided in the Code of Federal Regulations (CFR), Title 40, Parts 260-266, 268, 270, 273, and 279; Chapter 342J of the Hawaii Revised Statutes (HRS); and the Hawaii Administrative Rules (HAR), Title 11, Chapters 260-266, 268, 270, 273 and 279.

B. Facility Background

Company Web-Site	http://www.islandrecycling.com/
Site History	IRI is a privately owned company located on the island of Oahu in the state of Hawaii. According to the facility's website, IRI has over five locations in Hawaii and was established in the early 1980's (Attachment VI).
Number of Employees	According to ReferenceUSAGov.com the facility has 52 employees at this location (Attachment V).
Hours of Operation	Monday – Saturday: 8 am - 4 pm; Sunday: 9 am - 4 pm
Latitude/Longitude	21.301407 / - 158.11006 : (http://itouchmap.com/latlong.html)
Facility Operations	IRI converts certain types of municipal waste into raw commodities through recycling. The facility provides recycling services for various materials including cardboard, aluminum cans, electronics, scrap metal, batteries, Cathode Ray Tubes (CRTs), wooden pallets and tires (Attachment V).
RCRA and Non-RCRA Hazardous Wastes Streams	<p>IRI accepts and/or generates used oil (non-hazardous waste), paint waste (D001 waste), universal waste lamps and batteries (non-hazardous waste), broken batteries (D008 waste), electronic wastes (non-hazardous waste), intact and broken CRTs (D008), aerosol cans (D001 and D003 waste), as well as small capacitors (PCB and Non-PCB waste), and white goods.</p> <p><u>EPA Waste Codes:</u> D001, D003, and D008</p> <p><u>State Waste Codes:</u> N/A</p>

Facility Status	According to RCRA Info, IRI is not a generator of hazardous waste (Attachment IV). However, during EPA's inspection, the inspector observed a broken battery (D008) and several discarded aerosol cans (D001 and D003 waste) being generated on-site. The discarded aerosol cans were not all free of propellant or hazardous waste liquids, nor were the cans being punctured and the hazardous wastes captured and containerized by IRI.
Compliance History	Based on RCRA Info, IRI was last inspected under RCRA on July 7, 2010 by HDOH (Attachment VII).
SIC/NAICS Codes	<p><u>SIC Code</u>: 5093-12 (Recycling Centers (Whls)); 3569-08 (Bailing Equipment & Supls-Manufacturers); 4953-02 (Garbage Collection); 5031-05 (Pallets & Skids (Whls)); Garbage Container Receptacles (Whls)); 5093-13 (Scrap Metals & Iron (Whls)); and 9999-66 (Federal Government Contractors)</p> <p><u>NAICS Code</u>: 423930 (Recyclable Material Merchant Wholesalers); 333999 (All Other Misc General Purpose Machinery Mfg); 562119 (Other Waste Collection); 423310 (Lumber, Plywood, Millwork/Wood Panel Merchant Whlsrs); 423820 (Farm & Garden Machinery & Equip Merchant Whlsrs); 423850 (Service Establishment Equip/Supls Merchant Whlsrs); 999990 (Unclassified Establishments)</p>

Below is an aerial photograph of the IRI facility, located in Kapolei, HI (Attachment II). Yard #1 of the facility is located in the small red triangular shaped area and Yard #2 is located within the larger red line area indicated below.



C. On-Site Inspection

The on-site inspection portion of the CEI took place in Yard #1 and Yard #2 of the facility. In Yard #1 the inspectors visited IRI's Customer Parking Lot Area, the Copper Storage Area, Truck Loading Area, and the Nonferrous Metal Processing Areas (Holding, Sorting, and Bailing).




In Yard #2 the inspectors visited the facility's Steel Pile Area, the Repair Shop, White Good's Recycling Area, Mercury and Freon Removal Area, Electronic Storage Area, Baled Steel & Auto Holding Area, H-Power Shredded Ferrous Metal Area and the Loading Dock Area. No long term Hazardous Waste Storage Areas were observed on-site.


1. Yard #1 - Satellite Accumulation Areas (SAAs)

IRI stored one pallet of universal waste batteries, four CRT monitors, and one broken hazardous waste battery in the facility's Customer Parking Lot. According to the facility, the material was being stored there temporarily until processed. It was unknown how long the waste had been stored there prior to EPA's visit.

IRI also stored two universal waste batteries in the facility's Copper Storage Area and near the Truck Loading Area. In addition, the inspectors observed three pallets of universal waste batteries being stored on one of IRI's trucks.

The following table summarizes the observations made during the on-site inspection portion of the CEI in Yard #1 of the facility.


Observation	Photograph
<p>1. EPA observed two pallets of universal waste batteries that were not properly marked or dated in Yard #1 of IRI's facility. One of the pallets was observed in IRI's Customer Parking Area and the other pallet was observed on a trailer truck, in the facility's Truck Loading Area.</p>	 <p>No. 1 (P6270165.JPG)</p>
<p>2. EPA observed a broken battery sitting in IRI's Customer Parking Area (Yard #1). The facility failed to conduct a waste determination on the broken battery and therefore did not containerize the waste to prevent releases, mark the waste to identify the material as a hazardous waste or date the waste to indicate how long the waste had been stored on-site.</p>	 <p>No. 2 (P6270166.JPG)</p>
<p>3. EPA observed four monitors in IRI's Customer Parking Lot Area (Yard #1). The CRT monitors were not broken and being accumulated for purposes of recycling. The CRTs were not marked to identify the equipment as such or managed as required by law. IRI sends its CRTs to California for recycling.</p>	 <p>No. 3 (P6270170.JPG)</p>



Observation	Photograph
<p>4. EPA observed two Universal Waste Batteries stored in Yard #1, that were not being used while on-site. One of the batteries was observed in a pile of scrap metal, electronics and wires, while the other battery was observed sitting on a ledge near the facility's Truck Loading Area. The batteries were not properly marked or dated to indicate how long the waste had been accumulated on-site.</p>	 <p>No. 4 (P6270182.JPG)</p>




2. Yard #2 - Satellite Accumulation Areas (SAAs)


EPA observed two 55-gallon drums and three pans of used oil being accumulated in IRI's Baled Steel & Auto Holding and H-Power Shredded Ferrous Metal Areas; oily absorbent material on the ground in IRI's Used Oil Storage Area; two 55-gallon drums of small capacitors in IRI's white Goods and Repair Shop Areas; four 55-gallon drums of electronics in the facility's Electronic Storage Area; and aerosol cans discarded in various metal piles all around Yard #2.

The following table summarizes the observations made during the on-site inspection portion of the CEI in Yard #2 of the facility.

Observation	Photograph
<p>1. EPA observed two unmarked 55-gallon drums of small capacitors on-site. According to IRI's representative the capacitors contained a mixture of PCB (≥ 50 ppm) and non-PCB capacitors.</p>	 <p>No. 1 (P6270190.JPG)</p>

Observation	Photograph
<p>2. EPA observed one broken CRT in Yard #2 of the IRI facility. The CRT was not properly containerized, or marked to indicate the presence of a broken CRT monitor on-site.</p>	 <p>No. 2 (P6270221.JPG)</p>
<p>3. EPA observed oily absorbent material on the ground in at least two areas of IRI's Used Oil Storage Area.</p>	 <p>No. 3 (20140627_142129.JPG)</p>

Observation	Photograph
<p>4. EPA observed one open 5-gallon container of paint waste (non-hazardous waste) and two closed 5-gallon containers of paint product on-site. None of the three containers were marked to indicate whether they were a product or a waste.</p>	 <p>No. 4 (20140627_142540.JPG)</p>
<p>5. EPA observed three unlabeled 1-gallon containers of unknown material near IRI's Used Oil Storage Area. According to IRI, two of the containers contained paint primer (non-hazardous waste) product. The third container contained an unknown substance marked with a corrosive label. IRI later managed the unknown container as a corrosive hazardous waste liquid (D002 waste).</p>	 <p>No. 5 (20140627_142606.JPG)</p>
<p>6. EPA observed two open 55-gallon drums of used oil that were not marked with the words "Used Oil." In addition, EPA also documented three open small plastic pans of used oil in in Yard #2 that were also not marked with the words "Used Oil" as required by law.</p>	 <p>No. 6 (20140627_143546.JPG)</p>

Observation	Photograph
<p>7. EPA observed several aerosol cans (D001 and D003 waste) thrown in several metal piles all around Yard #2. The cans were placed there for the purposes of recycling of the metal. The aerosol cans were not totally empty nor punctured, and therefore regulated for disposal under RCRA. At the time of EPA's inspection, IRI had not identified the cans as a potential RCRA waste stream on-site. Nor had it manifested the waste off-site for disposal previously.</p>	 <p>No. 7 (20140627_144409.JPG)</p>

D. Record Review

Record	Year(s)	Observation(s)
Manifests	2009-2014	Not Reviewed. IRI regularly generates aerosol cans (D001 and D003 waste) on-site. At the time of EPA's inspection, IRI failed to identify those aerosol cans as a RCRA hazardous waste or properly track or manifest off the quantities generated. As such, it is unknown if IRI is subject to the manifest requirements under RCRA.
Land Disposal Restriction (LDR) Notifications	2009-2014	Not Reviewed. IRI regularly generates aerosol cans (D001 and D003 waste) on-site. At the time of EPA's inspection, IRI failed to identify those aerosol cans as a RCRA hazardous waste or properly track or manifest off the quantities generated. As such, it is unknown if IRI is subject to the LDR requirements under RCRA.
Contingency Plan (Business Plan)		Not Applicable.
Inspection Checklists		Not Applicable.

Record	Year(s)	Observation(s)
Training Records and Documentation		Not Applicable.
Biennial Report		Not Applicable.
Tank Certification		Not Applicable.

Comments: According to IRI's RCRA Info Detail Sheet (Attachment IV) the facility reports that it is not a generator of hazardous waste. In addition, IRI stated in the facility's August 7, 2014 email response that IRI is a transporter and a Large Quantity Handler of Universal Waste.

Under RCRA, a facility is considered a Conditionally Exempt Small Quantity Generator (CESQG), meaning exempt from certain storage, record keeping and reporting requirements, if the facility identifies all of their hazardous waste streams on-site (make a waste determination), and/or is below the minimum accumulation thresholds for hazardous waste generated per month or at any given time throughout a given calendar year.

During EPA's 2014 inspection, EPA identified wastes in the form of aerosol cans (D001 and D003 waste) and broken batteries (D008 waste) that had not been previously identified as hazardous at IRI. As such, once IRI failed to make a waste determination of all its hazardous waste streams on-site, the facility became subject to the generator storage, record keeping and reporting requirements under RCRA. However, due to the fact that the facility had not manifested hazardous waste off previously, it is difficult to determine IRI's true generator status.

Since the inspection, IRI has collected all of its aerosol cans on-site and consolidated them into four 55-gallon drums worth of hazardous waste.

At this time, EPA believes IRI needs to reevaluate the facility's hazardous waste generator status under RCRA. Currently, EPA considers IRI to be operating as a CESQG based on the fact that an unknown quantity of hazardous waste was generated monthly or at any given time throughout the calendar year.

E. Areas of Concern

1. EPA observed two 55-gallon containers of small capacitors on-site. IRI reports that the small capacitors contained a mix of PCB and non-PCB regulated capacitors on-site. EPA recommends that IRI either not accept PCB containing small capacitors on-site or manage the mixture of PCB and non-PCB small capacitor containers as PCB regulated waste moving forward.
2. The EPA inspector observed at least two areas on the ground in the Used Oil Storage Area that were covered with oily absorbent material from oil spills. EPA recommends that IRI minimize its releases of used oil on-site and cleanup all oily absorbent areas.

POTENTIAL VIOLATIONS
of
Hawaii Administrative Rules (HAR), Title 11 and
RCRA 40 CFR Hazardous Waste Management Regulations

NO.	STATUTE OR REGULATION	REGULATION SUMMARY	FINDING(s)	FACILITY RESPONSE
1	40 CFR § 261.39(a)(1)(ii)	<p>Used, broken CRTs are not solid wastes if they meet the following conditions:</p> <p>(a) <i>Prior to Processing</i>: these materials are not solid wastes if they are destined for recycling and if they meet the following requirements:</p> <p>(1) <i>Storage</i>. The broken CRTs must be either:</p> <p>(ii) Placed in a container (i.e., a package or a vehicle) that is constructed, filled, and closed to minimize releases to the environment of CRT glass (including fine solid materials).</p>	IRI stored a broken CRT monitor on-site that was not stored in a closed container to minimize the potential release of lead waste to the environment.	IRI returned to compliance with this violation on or about August 13, 2014.
2	40 CFR § 261.39(a)(2)	<p>Used, broken CRTs are not solid wastes if they meet the following conditions:</p> <p>(a) <i>Prior to Processing</i>: these materials are not solid wastes if they are destined for recycling and if they meet the following requirements:</p> <p>(2) <i>Labeling</i>. Each Container in which the used, broken CRT is contained must be labeled or marked clearly with one of the following phrases: "Used cathode ray tube(s)-contains leaded glass" or "Leaded glass from televisions or computers." It must also be labeled: "Do not mix with other glass materials."</p>	IRI stored one broken and four intact used CRT monitors on-site that were not properly labeled as required by law.	IRI returned to compliance with this violation on or about August 13, 2014.

NO.	STATUTE OR REGULATION	REGULATION SUMMARY	FINDING(s)	FACILITY RESPONSE
3	HAR § 11-262-11 [40 CFR § 262.11]	<p>A person who generates a solid waste, as defined in 11-261-2, must determine if that waste is a hazardous waste using the following method:</p> <ol style="list-style-type: none"> He should first determine if the waste is excluded from regulation under 11-261-4. He must then determine if the waste is listed as a hazardous waste in subchapter D of chapter 11-261. For purposes of compliance with 11-268, or if the waste is not listed in subchapter D of chapter 11-261, the generator must then determine whether the waste is identified in subchapter C of chapter 11-261 by either: <ol style="list-style-type: none"> Testing the waste according to the methods set forth in subchapter C of chapter 11-261; or Applying knowledge of the hazardous characteristic of the waste in light of the materials or the processes used. If the waste is determined to be hazardous, the generator must refer to chapters 11-261, 11-264, 11-265, 11-266, 11-268, and 11-273 for possible exclusions or restrictions pertaining to management of the specific waste. 	<ol style="list-style-type: none"> IRI failed to perform a hazardous waste determination on the aerosol cans (D001 and D003) that the facility generated on-site. IRI failed to perform a hazardous waste determination on the broken battery (D008) that IRI generated on-site. IRI failed to perform a hazardous waste determination on an unmarked 1-gallon container of liquid waste marked with a corrosive label in the facility's Used Oil Storage Area. 	<ol style="list-style-type: none"> IRI returned to compliance with this violation on or about September 12, 2014. IRI returned to compliance with this violation on or about August 13, 2014. IRI returned to compliance with this violation on or about September 12, 2014.
4	HAR § 11-262-34(c)(1)(ii) [40 CFR § 262.34(c)(1)(ii)]	<p>A generator may accumulate as much as fifty-five gallons of hazardous waste or one quart of acutely hazardous waste listed in subsection 11-261-33(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with subsection (a) of this section provided he:</p> <ol style="list-style-type: none"> Marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers. 	IRI failed to mark a 1-gallon container of corrosive hazardous waste liquids (D002) with the words "Hazardous Waste," or with other words that identify the contents of the container.	IRI has not returned to compliance with this violation.

NO.	STATUTE OR REGULATION	REGULATION SUMMARY	FINDING(s)	FACILITY RESPONSE
5	HAR § 11-273-34(a) [40 CFR § 273.34(a)]	<p>A large quantity handler of universal waste must label or mark the universal waste to identify the type of universal waste as specified below:</p> <p>a) Universal waste batteries (i.e., each battery), or a container or tank in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste – Battery(ies)," or "Waste Batter(ies)," or "Used Battery(ies)."</p>	<p>1. EPA observed one pallet of universal waste batteries in IRI's Customer Parking Area that was not properly marked as required under RCRA.</p> <p>2. EPA also observed one pallet of universal waste batteries in IRI's Truck Loading Area that was not properly marked as required under RCRA.</p>	<p>1. IRI returned to compliance with this violation on or about August 7, 2014.</p> <p>2. IRI returned to compliance with this violation on or about August 7, 2014.</p>
6	HAR § 11-273-35(c) [40 CFR § 273.35(c)]	<p>A large quantity handler of universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration by:</p> <ol style="list-style-type: none"> 1) Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received; 2) Marking or labeling the individual item of universal waste (e.g., each battery or thermostat) with the date it became a waste or was received; 3) Maintaining an inventory system on-site that identifies the date the universal waste being accumulated became a waste or was received; 4) Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers or universal waste became a waste or was received; 5) Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received; or 6) Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. 	<p>1. EPA observed one pallet of universal waste batteries in Yard #1 of IRI's Customer Parking Area that was not properly dated as required under RCRA.</p> <p>2. EPA observed two used batteries in Yard #1 of the IRI facility that were not dated to indicate when the material first became a waste.</p> <p>3. EPA also observed one pallet of universal waste batteries in Yard #1 of IRI's Truck Loading Area that was not properly dated as required under RCRA.</p>	<p>1. IRI returned to compliance on or near August 7, 2014.</p> <p>2. IRI returned to compliance on or near August 7, 2014.</p> <p>3. IRI returned to compliance on or near August 7, 2014.</p>

NO.	STATUTE OR REGULATION	REGULATION SUMMARY	FINDING(s)	FACILITY RESPONSE
7	HAR § 11-279-22(c)(1) [40 CFR § 279.22(c)(1)]	Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."	<p>1. EPA observed two 55-gallon containers of used oil in Yard #2 of IRI's facility that were not marked with the words "Used Oil," as required under RCRA.</p> <p>2. EPA observed three plastic pans of used oil in Yard #2 of IRI's facility that were not marked with the words "Used Oil," as required under RCRA.</p>	<p>1. IRI returned to compliance with this violation on or about September 12, 2014.</p> <p>2. IRI returned to compliance with this violation on or about September 12, 2014.</p>

List of Attachments

1. Attachment I: Facility, EPA and State Participants Extended List
2. Attachment II: Site Plan for Island Recycling
3. Attachment III: Photograph Log with Photographs
4. Attachment IV: RCRA Site Detail Dated June 10, 2014
5. Attachment V: ReferenceUSAGOV.com Detail Sheet Dated June 16, 2014
6. Attachment VI: Island Recycling, Inc.'s Website Entry.
7. Attachment VII: IRI's RCRA Info Evaluation Dated September 8, 2014

ATTACHMENT I

Facility, EPA, State and CUPA Participants Extended List

Island Recycling, Inc.
91-140 Kaomi Loop
Kapolei, HI 96707

June 27, 2014

Facility, EPA and State Participants Extended List

(Island Recycling, Inc. – June 27, 2014 RCRA Inspection)

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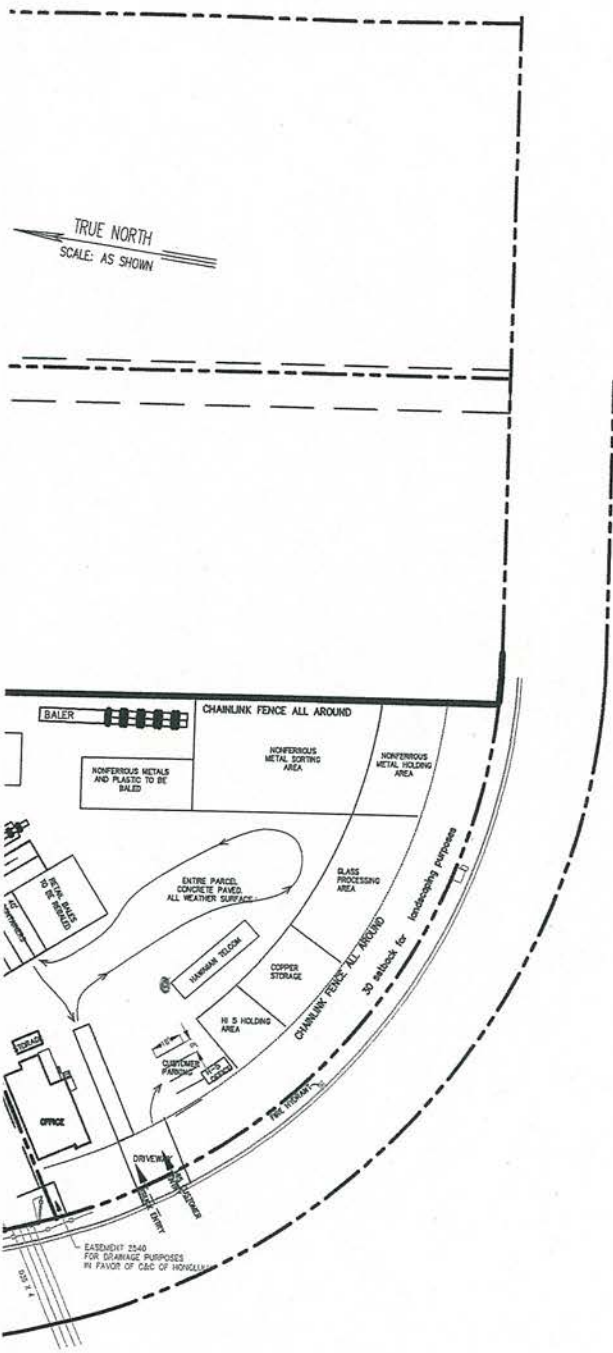
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ATTACHMENT II

Site Map

Island Recycling, Inc.
91-140 Kaomi Loop
Kapolei, HI 96707

June 27, 2014



SITE PLAN

No.	Revision/Issue	Date

Firm Name and Address
ISLAND RECYCLING, INC.
 P.O. BOX 30227
 HONOLULU, HI 96820

Project Name and Address
ISLAND RECYCLING, INC.
KAPOLEI SITE JOINT DEVELOPMENT
 91-140 KAOHI LOOP, KAPOLEI, OAHU, HAWAII

Project	0807	Sheet 01
Date	7/8/08	
Scale	AS SHOWN	

ATTACHMENT III

Photograph Log with Photographs

Island Recycling, Inc.
91-140 Kaomi Loop
Kapolei, HI 96707

June 27, 2014

ATTACHMENT III

Photograph log for the U.S. Environmental Protection Agency (U.S. EPA), Region IX's RCRA CEI Inspection at Island Recycling, Inc. (IRI), located at 91-140 Kaomi Loop, in Kapolei, Hawaii on June 27, 2014.

Photographs in this log were taken on an Olympus StylusTough-6000 digital camera by Nicole Samaniego, Environmental Health Specialist with HDOH and a Samsung Galaxy Rugby Pro cell phone by Christopher Rollins, Environmental Protection Specialist with U.S. EPA, Region IX.

<u>Photograph # and Date</u>	<u>Brief Description</u>
IMG_P6270164.JPG 6/27/2014	Photo of an IRI truck parked outside of the facility's main entrance.
IMG_P6270165.JPG 6/27/2014	Photo of a pallet of unmarked and undated used batteries in IRI's Customer Parking Area.
IMG_P6270166.JPG 6/27/2014	Photo of a pallet of electronics and one broken, unmarked and undated battery in IRI's Customer Parking Area.
IMG_P6270167.JPG 6/27/2014	A close up photo of IRI's broken battery with an opening in one of the connectors in the battery.
IMG_P6270168.JPG 6/27/2014	A second close up of IRI's broken battery.
IMG_P6270169.JPG 6/27/2014	Photo of additional electronics in IRI's Customer Parking Area.
IMG_P6270170.JPG 6/27/2014	Photo of four Cathode Ray Tube (CRT) monitors in IRI's Customer Parking Area.
IMG_P6270171.JPG 6/27/2014	Photo of scrap metal sitting in cardboard boxes in Yard #1 of IRI's facility.
IMG_P6270172.JPG 6/27/2014	Photo of a sign that says "A/C Compressor," sitting in Yard #1 of IRI's facility.
IMG_P6270173.JPG 6/27/2014	Photo of a 55-gallon poly drum of electronic devices in Yard #1 of IRI's facility.
IMG_P6270174.JPG 6/27/2014	Photo of scrap wire and scrap metal sitting in Yard #1 of IRI's facility.

IMG_P6270175.JPG 6/27/2014	Photo of a used battery sitting in a pile of scrap wire and metal in Yard #1 of IRI's facility.
IMG_P6270176.JPG 6/27/2014	A far away photo of a used battery sitting in a pile of scrap with and metal in Yard #1 of IRI's facility.
IMG_P6270177.JPG 6/27/2014	Photo of a 55-gallon drum of non-PCB small capacitors in Yard#1 of IRI's facility.
IMG_P6270178.JPG 6/27/2014	A close up photo of non-PCB small capacitors in Yard #1 of IRI's facility.
IMG_P6270179.JPG 6/27/2014	A photo of a second 55-gallon drum of non-PCB small capacitors in Yard #1 of IRI's facility.
IMG_P6270180.JPG 6/27/2014	Photo of a 55-gallon drum of scrap lead metal scrap in Yard #1 of IRI's facility.
IMG_P6270181.JPG 6/27/2014	Photo of a second unmarked and undated universal waste battery near IRI's Truck Loading Area in Yard #1.
IMG_P6270182.JPG 6/27/2014	A close up photo of an unmarked and undated universal waste battery near IRI's Truck Loading Area in Yard #1.
IMG_P6270183.JPG 6/27/2014	Photo of three pallets of universal waste batteries sitting on a truck in Yard #1 of IRI's facility.
IMG_P6270184.JPG 6/27/2014	A close up photo of the one unmarked and undated pallet of universal waste batteries on a truck in Yard #1 of IRI's facility.
IMG_P6270185.JPG 6/27/2014	A second close up photo of the one unmarked and undated pallet of universal waste batteries on a truck in Yard #1 of IRI's facility.
IMG_P6270186.JPG 6/27/2014	Photo of the universal waste label and date on the top pallet of universal waste batteries on a truck in Yard #1 of IRI's facility.
IMG_P6270187.JPG 6/27/2014	Photo of a pole marked "R-22" in Yard #2 of IRI's facility.
IMG_P6270188.JPG 6/27/2014	Photo of small container of mercury switches marked as universal waste in Yard #2 of IRI's facility.
IMG_P6270189.JPG 6/27/2014	Photo of an open white poly drum of PCB and non-PCB small capacitors in Yard #2 of IRI's facility.

IMG_P6270190.JPG 6/27/2014	Wide shot photo of an open white poly drum of PCB and non-PCB small capacitors in Yard #2 of IRI's facility.
IMG_P6270191.JPG 6/27/2014	Photo of used refrigerators and white goods in Yard #2 of IRI's facility.
IMG_P6270192.JPG 6/27/2014	Photo of an unmarked and undated poly drum of material sitting in Yard #2 of IRI's facility.
IMG_P6270193.JPG 6/27/2014	Photo of damaged cardboard box of bullet casings sitting in Yard #2 of IRI's facility.
IMG_P6270194.JPG 6/27/2014	A close up photo bullet casings sitting in Yard #2 of IRI's facility.
IMG_P6270195.JPG 6/27/2014	Photo of four open and unmarked 55-gallon drums of electronic waste awaiting processing and sorting in Yard #2 of IRI's facility.
IMG_P6270196.JPG 6/27/2014	Photo of a cardboard box of electronic waste awaiting processing and sorting in Yard #2 of IRI's facility.
IMG_P6270197.JPG 6/27/2014	a close up photo of electronic waste awaiting processing and sorting in Yard #2 of IRI's facility.
IMG_P6270198.JPG 6/27/2014	Photo of about six large green tip fluorescent bulbs in Yard #2 of IRI's facility.
IMG_P6270199.JPG 6/27/2014	A close up photo of about six large green tip fluorescent bulbs in Yard #2 of IRI's facility.
IMG_P6270200.JPG 6/27/2014	Another photo of six large green tip fluorescent bulbs and electronic waste in Yard #2 of IRI's facility.
IMG_P6270201.JPG 6/27/2014	Photo of a cardboard box of electronic waste in Yard #2 of IRI's facility.
IMG_P6270202.JPG 6/27/2014	Photo of a cardboard box of electronic waste and cooling fans in Yard #2 of IRI's facility.
IMG_P6270203.JPG 6/27/2014	Photo of a cardboard box of electronics and power supply boxes in Yard #2 of IRI's facility.
IMG_P6270204.JPG 6/27/2014	Photo of another cardboard box of electronic waste in Yard #2 of IRI's facility.

IMG_P6270205.JPG 6/27/2014	Photo of a cardboard box of Hawaii Revised Statutes (HRS) book covers in Yard #2 of IRI's facility.
IMG_P6270206.JPG 6/27/2014	A close of photo of the cardboard box of HRS book covers in Yard #2 of IRI's facility.
IMG_P6270207.JPG 6/27/2014	Photo of an unknown poly drum container in Yard #2 of IRI's facility.
IMG_P6270208.JPG 6/27/2014	Photo of four 55-gallon containers of electronic waste in Yard #2 of IRI's facility.
IMG_P6270209.JPG 6/27/2014	Photo of one 55-gallon container of electronics marked "RAM" in Yard #2 of IRI's facility.
IMG_P6270210.JPG 6/27/2014	Photo of one 55-gallon container of electronics marked "Processor" in Yard #2 of IRI's facility.
IMG_P6270211.JPG 6/27/2014	Photo of three of the 55-gallon containers of electronic waste in Yard #2 of IRI's facility.
IMG_P6270212.JPG 6/27/2014	Photo of two of the 55-gallon containers of electronic waste in Yard #2 of IRI's facility.
IMG_P6270213.JPG 6/27/2014	Photo of three weather worn cardboard boxes marked "1993 HRS Replacement Volumes 8-14" in Yard #2 of IRI's facility.
IMG_P6270214.JPG 6/27/2014	Photo of IRI's Yard #2 looking Northeast.
IMG_P6270215.JPG 6/27/2014	Photo of a 5-gallon container of paint primer in Yard #2 of IRI's facility.
IMG_P6270216.JPG 6/27/2014	Photo of H-Power's shredded and burnt ferrous metal in Yard #2 of IRI's facility.
IMG_P6270217.JPG 6/27/2014	A close up photo of H-Power's shredded and burnt ferrous metal in Yard #2 of IRI's facility.
IMG_P6270218.JPG 6/27/2014	Photo of additional scrap metal and electronics in Yard #2 of IRI's facility.
IMG_P6270219.JPG 6/27/2014	Photo of old cabling and electronics in Yard #2 of IRI's facility.
IMG_P6270220.JPG 6/27/2014	Photo of a broken CRT monitor in Yard #2 of IRI's facility.

IMG_P6270221.JPG 6/27/2014	A close up photo of the broken CRT monitor in Yard #2 of IRI's facility.
IMG_P6270222.JPG 6/27/2014	Another close up of photo of the broken CRT monitor in Yard #2 of IRI's facility.
IMG_P6270223.JPG 6/27/2014	Photo of scrap wire and cabling in Yard #2 of IRI's facility.
IMG_P6270224.JPG 6/27/2014	Another photo of the 5-gallon container of paint primer in Yard #2 of IRI's facility.
IMG_P6270225.JPG 6/27/2014	Photo of a door marked "Motor Oil" in Yard #2 of IRI's facility.
IMG_P6270226.JPG 6/27/2014	Photo of a door marked "Coolant" in Yard #2 of IRI's facility.
IMG_P6270227.JPG 6/27/2014	Photo of aerosol cans (product) being stored on shelves in Yard #2 of IRI's facility.
20140627_141949.JPG 6/27/2014	Photo of an open 1-gallon container of unknown liquid in Yard #2 of IRI's facility.
20140627_142000.JPG 6/27/2014	Photo of an open, unmarked and unknown tank of red and blue liquid in Yard #2 of IRI's facility.
20140627_142008.JPG 6/27/2014	Photo of an open, unmarked and unknown tank of black liquid in Yard #2 of IRI's facility.
20140627_142057.JPG 6/27/2014	Photo of oily absorbent material on the ground in Yard #2 of IRI's facility.
20140627_142129.JPG 6/27/2014	Photo of additional oily absorbent material on the ground in in Yard #2 of IRI's facility.
20140627_142138.JPG 6/27/2014	Photo of a secondary containment unit in Yard #2 of IRI's facility.
20140627_142204.JPG 6/27/2014	Photo of containers of Used Oil and Motor Oil in Yard #2 of IRI's facility.
20140627_142352.JPG 6/27/2014	Photo of an open, unmarked and unknown pan of liquid in Yard #2 of IRI's facility.
20140627_142359.JPG 6/27/2014	Photo of a container of used oil in Yard #2 of IRI's facility.

20140627_142540.JPG 6/27/2014	Photo of an open and unmarked 5-gallon container of paint in Yard #2 of IRI's facility.
20140627_142549.JPG 6/27/2014	Photo of three 5-gallon containers of paint in Yard #2 of IRI's facility.
20140627_142606.JPG 6/27/2014	Photo of three unmarked 1-gallon containers of unknown material in Yard #2 of IRI's facility.
20140627_142806.JPG 6/27/2014	A second photo of three unmarked 1-gallon containers of unknown material in Yard #2 of IRI's facility.
20140627_143105.JPG 6/27/2014	Photo of an open and unmarked pan of used oil in Yard #2 of IRI's facility.
20140627_143112.JPG 6/27/2014	Photo of an aerosol can sitting on a blue bin in Yard #2 of IRI's facility.
20140627_143302.JPG 6/27/2014	Photo of aerosol cans discarded in a scrap metal pile in Yard #2 of IRI's facility.
20140627_143501.JPG 6/27/2014	Another photo of oily absorbent on the ground in Yard #2 of IRI's facility.
20140627_143526.JPG 6/27/2014	Photo of an unmarked 55-gallon container and pan of used oil in Yard #2 of IRI's facility.
20140627_143541.JPG 6/27/2014	Close up photo of an unmarked 55-gallon container of used oil in Yard #2 of IRI's facility.
20140627_143547.JPG 6/27/2014	Close up of the inside of the unmarked 55-gallon container of used oil in Yard #2 of IRI's facility.
20140627_143555.JPG 6/27/2014	Photo of a second unmarked 55-gallon container of used oil in Yard #2 of IRI's facility.
20140627_143600.JPG 6/27/2014	Photo of two unmarked pans of used oil in Yard #2 of IRI's facility.
20140627_143934.JPG 6/27/2014	Photo of H-Power's burnt shredded ferrous metal in loaded on a truck in Yard #2 of IRI's facility.
20140627_143941.JPG 6/27/2014	Photo of three trucks being loaded with burnt shredded ferrous metal in Yard #2 of IRI's facility.

20140627_144026.JPG 6/27/2014 Photo of additional aerosol cans discarded in a metal pile in Yard #2 of IRI's facility.

20140627_144112.JPG 6/27/2014 Photo of crushed and empty non-PCB transformers in Yard #2 of IRI's facility.

20140627_144242.JPG 6/27/2014 Third photo of aerosol cans discarded in a metal pile in Yard #2 of IRI's facility.

20140627_144248.JPG 6/27/2014 Photo of two aerosol cans in Yard #2 of IRI's facility.

20140627_144409.JPG 6/27/2014 Photo of aerosol cans and a dried paint can being stored in Yard #2 of IRI's facility.

20140627_144442.JPG 6/27/2014 Photo of an unmarked and unknown 55-gallon container of purple liquid in Yard #2 of IRI's facility.

20140627_144639.JPG 6/27/2014 Photo of a truck from Soares Truck Rental dropping off cars in Yard #2 of IRI's facility.

20140627_144643.JPG 6/27/2014 Another photo of a truck from Soares Truck Rental dropping off cars in Yard #2 of IRI's facility.

20140627_144707.JPG 6/27/2014 Photo of the Soares Truck Rental license plate in Yard #2 of IRI's facility.

20140627_144716.JPG 6/27/2014 Photo of scrap metal and car parts loaded on the Soares Truck Rental truck in Yard #2 of IRI's facility.

20140627_144720.JPG 6/27/2014 Photo of a car loaded on the Soares Truck Rental truck in Yard #2 of IRI's facility.

- END of log for 6/27/2014



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ATTACHMENT IV

RCRA Site Detail Sheet dated June 10, 2014

Island Recycling, Inc.
91-140 Kaomi Loop
Kapolei, HI 96707

June 27, 2014

RCRA Site Detail

Report run on: June 10, 2014 - 4:45 PM

Page 3

*** WARNING *** Sensitive information may be displayed on this report. *** WARNING ***

ISLAND RECYCLING INC

HIR000138263

EPA Region:09 Extract:Y County:HONOLULU

State District:

Universes	Federal Generator:	N	Transporter:	Y	Operating TSDF:	-----	Active:	Y
	State Generator:	N	Importer:	N	Commercial:	N	EI Indicator (HE / GW):	N / N
	Short Term Generator:	N	Mixed Waste Generator:	N	HSM:	N	IC In Place:	N
	Subpart K/College:	N	Subpart K/Hospital:	N	Subpart K/Non-profit:	N	Subpart K/Withdrawal:	N

Latitude/Longitude Measure - Owner: Seq #:

Coordinates:

Receive Date: 02/16/2011

Source Type: Implementer

Seq. Number: 1

Location 91-140 KAOMI LOOP
Address: KAPOLEI, HI 96707

Mailing Address: PO BOX 30227
HONOLULU, HI 96820
UNITED STATES

Contact Person KAREN Y. SHINMOTO PO BOX 30227
For Source (808) 682-9200 ext. 223 HONOLULU, HI 96820
Information KAREN@ISLANDRECYCLING.COM UNITED STATES

Owner (current) PO BOX 7695 Type: Private
KAPOLEI RECYCLING LLC VAN NUYS, CA 91409
From: 06/18/2005 To: VAN NUYS Phone:

Operator (current) Type: Private
ISLAND RECYCLING INC
From: 06/18/2005 To: Phone:

Land Type: Private Non Notifier: No TSD Date: Accessibility:

NAICS Codes: 562111 SOLID WASTE COLLECTION
56292 MATERIALS RECOVERY FACILITIES

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; State: HI-N Not a Generator, Verified

Other Hazardous Waste Generator Activities

Short Term Generator:	No
Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	Yes
Transfer Facility:	No
TSD Activity:	No
Recycler Activity:	No
Off-Site Receipt:	No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption:	No
Smelting, Melting, Refining Furnace Exemption:	No

Underground Injection Control: No

Destination Facility for Universal Waste: No

Used Oil Activities

Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Transporter:	No	
Transfer Facility:	No	
Used Oil Processor and/or Re-refiner Activity	Used Oil Fuel Marketer Activity	
Processor:	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Refiner:	No	
	Marketer who first claims the used oil meets the specifications:	No

Subpart K

College/University:	No	Non-profit Research Institute:	No
Teaching Hospital:	No	Withdrawal:	No

Universal Waste Activities:

Description	Generated	Accumulated/Managed
Batteries		Y
Lamps		Y
Mercury containing equipment		Y

RCRA Site Detail

Report run on: June 10, 2014 - 4:45 PM

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*** WARNING *** Sensitive information may be displayed on this report. *** WARNING ***

Receive Date: 06/21/2007	Source Type: Notification	Seq. Number: 1
Location 91 140 KAOMI LOOP Address: KAPOLEI, HI 96707		Mailing Address: PO BOX 30227 HONOLULU, HI 96820-0 UNITED STATES

Contact Person KAREN Y. SHINMOTO
 For Source 808-682-9200 ext. 223
 Information KAREN@ISLANDRECYCLING.COM
 PO BOX 30227
 HONOLULU, HI 96820
 UNITED STATES

Owner (current) PO BOX 7695 Type: Private
 KAPOLEI RECYCLING LLC VAN NUYS, CA 91409 Phone:
 From: 06/18/2005 To: VAN NUYS

Operator (current) Type: Private
 ISLAND RECYCLING INC Phone:
 From: 06/08/2005 To:

Land Type: Private Non Notifier: No TSD Date: Accessibility:

NAICS Codes: 562111 SOLID WASTE COLLECTION
 56292 MATERIALS RECOVERY FACILITIES

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: HI-N Not a Generator, Verified

Other Hazardous Waste Generator Activities

Short Term Generator:	No
Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	No
Transfer Facility:	No
TSD Activity:	No
Recycler Activity:	No
Off-Site Receipt:	No
Exempt Boiler and/or Industrial Furnace	
Small Quantity Onsite Burner Exemption:	No
Smelting, Melting, Refining Furnace Exemption:	No
Underground Injection Control:	No
Destination Facility for Universal Waste:	No

Used Oil Activities

Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Transporter:	No	
Transfer Facility:	No	
Used Oil Processor and/or Re-refiner Activity	Used Oil Fuel Marketer Activity	
	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Processor:	Marketer who first claims the used oil meets the specifications:	No
Refiner:	No	
Subpart K		
College/University:	No	Non-profit Research Institute:
Teaching Hospital:	No	Withdrawal:
		No

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D008 F002 U066

* End of Report *

ATTACHMENT V

ReferenceUSAGOV.com Entry dated June 16, 2014

Island Recycling, Inc.
91-140 Kaomi Loop
Kapolei, HI 96707

June 27, 2014

GSA Schedule: GS-23F-0096P
FEDLINK: LOC 04C-7005[Home](#) [My Account](#) [About Us](#) [Our Quality](#) [Contact Us](#) [FAQs](#) [Resource Center](#) [Job Help](#)

Selected Database: U.S. Businesses

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Island Recycling Inc Kapolei, HI

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[UCC Filings](#)
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Location Info

[Collapse](#)

Verified Record

Company Name	Island Recycling Inc	Phone	(808) 682-9200
Street Address	91-140 Kaomi Loop	Fax	Not Available
City, State ZIP	Kapolei, HI 96707	Toll Free Number	Not Available
County	Honolulu	Website	islandrecycling.com
Metro Area	Urbn Honolulu, HI		
Census Block Group	1	Census Tract	980300
Radius Search	<input type="text"/> miles FIND SIMILAR FIND ALL ADVANCED RADIUS SEARCH		

Job Listings

[Expand](#)

Industry Profile

[Collapse](#)

SIC Code	Descriptions
5093-12	Recycling Centers (Whls)
3569-08	Baling Equipment & Supls-Manufacturers
4953-02	Garbage Collection
5031-05	Pallets & Skids (Whls)
5083-16	Baling Equipment & Supplies (Whls)
5087-22	Garbage Container Receptacles (Whls)
5093-13	Scrap Metals & Iron (Whls)
9999-66	Federal Government Contractors
NAICS Code	Description
423930	Recyclable Material Merchant Wholesalers
333999	All Other Misc General Purpose Machinery Mfg
562119	Other Waste Collection
423310	Lumber, Plywood, Millwork/Wood Panel Mrchnt Whslrs

[Back to top](#)

423820	Farm & Garden Machinery & Equip Merchant Whlsrs
423850	Service Establishment Equip/Supls Merchant Whlsrs
999990	Unclassified Establishments
Franchise	Description
<i>None Available</i>	

Business Profile

[Expand](#)

Location Map

[Expand](#)

Business Demographics

[Collapse](#)

Location Employees	52	Location Sales Volume	\$67,078,000
Corporate Employees	<i>Not Available</i>	Corporate Sales Volume	<i>Not Available</i>
Type of Business	Private	Location Type	Single Loc
Parent Company	<i>Not Available</i>	Foreign Parent	<i>Not Available</i>
EIN	<i>Not Available</i>	Fortune 1000 Ranking	<i>Not Available</i>
Credit Cards Accepted	<i>Not Available</i>	Last Updated On	May, 2014
Years in Database	10	Year Established	<i>Not Available</i>
Square Footage	40,000+	Number of PCs	2 - 9 Pcs
IUSA Number	37-198-9856	Home Business	No
Credit Rating Score	B+	Latitude / Longitude	21.301410 / - 158.109600
Full Credit Report	Buy from Experian 	Location Centerpoint	Parcel

Hours of Operation

Mon	Tue	Wed	Thu	Fri	Sat	Sun
<i>Not Available</i>	<i>Not Available</i>	<i>Not Available</i>	<i>Not Available</i>	<i>Not Available</i>	<i>Not Available</i>	<i>Not Available</i>

Management Directory

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Nearby Businesses

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Competitors Report

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ATTACHMENT VI

Island Recycling, Inc.'s Website Entry (Facility Locations)

Island Recycling, Inc.
91-140 Kaomi Loop
Kapolei, HI 96707

June 27, 2014



[Home](#) [Locations](#) [What We Buy](#) [Products & Services](#) [About](#) [Contact Us](#)



Recycling & Hauling Services

Island Recycling, established in 1984, is the state's largest multi-commodity recycler. We offer a wide variety of services to corporate, industrial, municipal, and consumer clients.



Scrap Metal

We buy scrap metal from aluminum to zinc.

[More information...](#)



HI-5 Used Beverage Containers

HI-5

[More information...](#)



Scrap Steel

We buy scrap steel

[More information...](#)



Paper & Cardboard

Paper & Cardboard

[More information...](#)



Electronic Scrap

Electronic Scrap

[More information...](#)

HI-5 Cans and Bottles

Get paid for your cans, bottles, and other recyclables!

5 Convenient Locations

Open 7 Days a Week



Waipahu

94-819 Farrington Hwy. Waipahu, HI 96797

Mon-Sat: 8:00am - 4:00pm

Sun: 9:00am - 4:00pm



Campbell Industrial Park

91-140 Kaomi Loop, Kapolei, HI 96707

Mon-Sat: 8:00am - 4:00pm

Sun: 9:00am - 4:00pm



Kaimuki

2960 Waialae Ave. Honolulu, HI 96816

Mon-Sat: 8:00am - 4:00pm

Sun: 9:00am - 4:00pm



Nanakuli

87-1796 Farrington Hwy. Waianae, HI

96792

Daily: 8:00am - 4:00pm



Dillingham

1803 Dillingham Blvd. Honolulu, HI 96819

Mon-Sat: 8:00am - 4pm

Sun: 9am - 4pm

News

NOW OFFERING FREE TOWING



Plastics

Plastics

[More information...](#)



Island Recycling offers "FREE TOWING" for your old vehicles. Call ...



Batteries

Batteries

[More information...](#)



Tires

Tires

[More information...](#)

Our Mission

Keeping Hawaii clean and preserving Hawaii's and the World's precious natural resources.

Corporate Office

Campbell Industrial Park
91-140 Kaomi Loop,
Kapolei, Hawaii 96707

Contact Information

Phone: (808) 682-9200
Fax: (808) 682-9201
info@islandrecycling.com

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ATTACHMENT VII

IRI's RCRA Info Evaluation Dated September 8, 2014

Island Recycling, Inc.
91-140 Kaomi Loop
Kapolei, HI 96707

June 27, 2014



Evaluation List



ISLAND RECYCLING INC

KAPOLEI

HIR000138263

EPA Unaddressed SNC: N	EPA Addressed SNC: N	EPA SNC with Compliance Schedule Established: N
State Unaddressed SNC: N	State Addressed SNC: N	State SNC with Compliance Schedule Established: N
Out of State SNC: N		

[Add New Evaluation](#) [Show All Violations](#)

2 Evaluation(s) found.

Page: 1

Go To

Evaluations								Violations	
	Act Loc	Identifier	Type	Date	Agency	Resp Person	Evaluation Desc	Count	
1	HI	001	CEI	06/27/2014	E	CROLL	COMPLIANCE EVALUATION INSPECTION ON-SITE		Violations are undetermined.
2	HI	001	CEI	07/07/2010	S	TBRAN	COMPLIANCE EVALUATION INSPECTION ON-SITE	6	Show Violations

URL: /rcrainfo/cme/cme_eval_list.jsp

